

# **Exhibit A**

<p style="text-align: center;"><b>CHARGE OF DISCRIMINATION</b></p> <p style="font-size: small;">This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</p>	<p>Charge Presented To: <span style="float: right;">Agency(ies) Charge No(s):</span></p> <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> FEPA  <input checked="" type="checkbox"/> EEOC         </div> <div style="text-align: right;"> <p>440-2025-03648</p> </div> </div>
<p><b>Illinois Department of Human Rights</b> and EEOC</p> <p style="font-size: x-small;">State or local Agency, if any</p>	

Name (indicate Mr., Ms., Mrs., Mx.) <b>Mr. Khalid Gani</b>	Home Phone (Incl. Area Code) <div style="background-color: black; width: 100px; height: 20px;"></div>	Date of Birth <div style="background-color: black; width: 100px; height: 20px;"></div>
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Street Address <div style="background-color: black; width: 100%; height: 20px;"></div>	City, State and ZIP Code <div style="background-color: black; width: 100%; height: 20px;"></div>	Email Address <div style="background-color: black; width: 100%; height: 20px;"></div>
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Street Address <b>c/o Chad Eisenback, Sulaiman Law Group, 2500 S. Highland Ave., #200, Lombard, IL 60148</b>	City, State and ZIP Code <b>employment@sulaimanlaw.com</b>	Email Address <b>employment@sulaimanlaw.com</b>
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Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name <b>Juggernaut Tattoo LLC</b>	No. Employees, Members <b>15+</b>	Phone No. (Include Area Code) <b>(224) 480-7165</b>
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Street Address <b>3900 WASHINGTON ST # 1</b>	City, State and ZIP Code <b>GURNEE, IL 60031-5717</b>	Email Address 
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Name 	No. Employees, Members <b>15+</b>	Phone No. (Include Area Code) 
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Street Address 	City, State and ZIP Code 	Email Address 
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DISCRIMINATION BASED ON (Check appropriate box(es).)  <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"><input checked="" type="checkbox"/> RACE</div> <div style="width: 50%;"><input checked="" type="checkbox"/> COLOR</div> <div style="width: 50%;"><input checked="" type="checkbox"/> SEX</div> <div style="width: 50%;"><input checked="" type="checkbox"/> RELIGION</div> <div style="width: 50%;"><input checked="" type="checkbox"/> NATIONAL ORIGIN</div> <div style="width: 50%;"><input checked="" type="checkbox"/> RETALIATION</div> <div style="width: 50%;"><input type="checkbox"/> AGE</div> <div style="width: 50%;"><input type="checkbox"/> DISABILITY</div> <div style="width: 50%;"><input type="checkbox"/> GENETIC INFORMATION</div> <div style="width: 50%;"><input checked="" type="checkbox"/> OTHER (Specify below.) <b>Sexual Harassment</b></div> </div>	DATE(S) DISCRIMINATION TOOK PLACE <div style="display: flex; justify-content: space-between;"> <div>             Earliest  <b>2/2024</b> </div> <div>             Latest  <b>11/16/2024</b> </div> </div> <div style="text-align: center; margin-top: 10px;"> <input type="checkbox"/> CONTINUING ACTION         </div>
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THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I, Khalid Ghani, a Middle Eastern Muslim man, was hired at Juggernaut Tattoos, LLC, as a Piercer and Tattoo Artist on or around January 21, 2024 until I was unlawfully terminated on or around November 16, 2024, on the basis of my religion (Muslim), and national origin (U.A.E). I have also been subjected to race, religion, and national origin-based harassment and retaliation for engaging in protected activity.

The following is a non-exhaustive list of incidents of the race-, religion-, and national origin-based discrimination, harassment, and retaliation I was subjected to:

Beginning in or around March 2024, he owner, Leon Congeni (Caucasian), repeatedly made derogatory comments mocking my religion, including ridiculing the way Muslims pray and often asking, "How do you fucking pray?" Despite expressing my anger and stating, "I do not accept your apology; you do not understand my culture or religion," the offensive comments persisted, creating a hostile and humiliating work environment up until the day of my termination. I was in disbelief at how insensitive the work environment was but it was clear that Leon fostered a workplace that catered to prejudiced beliefs as evidenced by further examples.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	NOTARY – When necessary for State and Local Agency Requirements  I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT  SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)
I declare under penalty of perjury that the above is true and correct.  <div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div> <b>01 / 21 / 2025</b>  <hr style="width: 100%;"/> <p style="font-size: x-small;">Date</p> </div> <div style="text-align: center;">   <hr style="width: 100%;"/> <p style="font-size: x-small;">Charging Party Signature</p> </div> </div>	

<p><b>CHARGE OF DISCRIMINATION</b></p> <p>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</p>	<p>Charge Presented To: Agency(ies) Charge No(s):</p> <p><input type="checkbox"/> FEPA</p> <p><input checked="" type="checkbox"/> EEOC</p>
<p align="center"><b>Illinois Department of Human Rights</b> and EEOC</p> <p align="center"><i>State or local Agency, if any</i></p>	


THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

Starting early on in my employment in or around February 2024, My direct manager, Jeremy (LNU, Caucasian), treated me differently from my Caucasian colleagues. For example, he would stand over my shoulder and insist on recounting cash payments I collected, a level of scrutiny that was not applied to my Caucasian coworkers. Jeremy would also make discriminatory statement about "Spanish workers refusing to speak English in an American country." When I would speak Spanish with fellow employees who predominantly spoke Spanish, Jeremy would intervene and say, "Habla Ingles?" This comment reinforced a broader culture of hostility toward minorities and ethnic backgrounds, making me feel further alienated and targeted due to my Arabic heritage.

In or around October 2024, one of the owners, Tina Congeni, made an inappropriate comment towards my girlfriend, who also was a fellow employee, and I that was sexually charged. She said, "Maybe, we should pretend that you are not dating and flirt with customers, so you can get customers in." Tina then told my partner separately, "You should put on a skirt and do a little dance on TikTok so you can get tips."

On or around November 16, 2024, I was unjustly terminated. As I was packing my belongings, Jeremy became accusatory and falsely accused me of stealing. I yelled back, stating that I was not a thief and was only packing my materials. Notably, Jeremy's conduct with a Caucasian employee who was terminated was entirely different. She was not subject to this utterly baseless accusation as I was which further cemented how bigoted this work environment truly was.

Thus, I have been discriminated against and harassed because of my race (Middle Eastern), religion (Muslim), and national origin, and retaliated against for engaging in protected activity, in violation of Title VII of the Civil Rights Act of 1964, as amended, and the Illinois Human Rights Act (775 ILCS 5/).

<p>I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.</p>	<p>NOTARY – When necessary for State and Local Agency Requirements</p>
<p>I declare under penalty of perjury that the above is true and correct.</p> <p>01 / 21 / 2025</p> <p align="center"></p> <p align="center">Date Charging Party Signature</p>	<p>I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.</p> <p>SIGNATURE OF COMPLAINANT</p> <p>SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)</p>

EEOC Received: 1-21-2025

<p><b>CHARGE OF DISCRIMINATION</b></p> <p>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</p>	<p>Charge Presented To: _____ Agency(ies) Charge No(s): _____</p> <p><input type="checkbox"/> FEPA</p> <p><input checked="" type="checkbox"/> EEOC</p>
<p align="center"><b>Illinois Department of Human Rights</b> _____ and EEOC</p> <p align="center"><i>State or local Agency, if any</i></p>	

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<p>I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.</p>	<p>NOTARY – <i>When necessary for State and Local Agency Requirements</i></p>
<p>I declare under penalty of perjury that the above is true and correct.</p>    <p>_____</p> <p align="center"><i>Date</i></p>	<p>I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.</p> <p>SIGNATURE OF COMPLAINANT</p>    <p>SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE</p> <p><i>(month, day, year)</i></p>
<p align="center">_____</p> <p align="center"><i>Charging Party Signature</i></p>	

CP Enclosure with EEOC Form 5 (11/09)

**PRIVACY ACT STATEMENT:** Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

**1. FORM NUMBER/TITLE/DATE.** EEOC Form 5, Charge of Discrimination (11/09).

**2. AUTHORITY.** 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.

**3. PRINCIPAL PURPOSES.** The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.

**4. ROUTINE USES.** This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.

**5. WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION.** Charges must be reduced to writing and should identify the charging party and respondent and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, ADA, or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

#### NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so within 15 days of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

#### NOTICE OF NON-RETALIATION REQUIREMENTS


Please **notify** EEOC or the state or local agency where you filed your charge **if retaliation is taken against you or others** who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, and Section 503(a) of the ADA and Section 207(f) of GINA, it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.



Audit trail

Title	Final EEOC Charge - Please review and sign
File name	EEOC_Charge_Khalid_Gani__3_.pdf
Document ID	02e353236290ecb1179bf1722124853434411a45
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Status	● Signed

Document History

 SENT	<b>01 / 14 / 2025</b> 00:18:08 UTC	Sent for signature to Khalid Gani (khaliidg000@gmail.com) from cnieves@sulaimanlaw.com IP: 70.162.61.166
 VIEWED	<b>01 / 14 / 2025</b> 01:14:32 UTC	Viewed by Khalid Gani (khaliidg000@gmail.com) IP: 73.208.237.176
 SIGNED	<b>01 / 21 / 2025</b> 21:18:08 UTC	Signed by Khalid Gani (khaliidg000@gmail.com) IP: 172.59.97.120
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